IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SANDRA L. PALLATTO, Plaintiff, vs. WESTMORELAND COUNTY CHILDREN'S BUREAU, a local agency of Westmoreland County, Defendant.	**ELECTRONICALLY FILED** No. 2:11-cv-01206 The Honorable David S. Cercone **JURY TRIAL DEMANDED**

PRETRIAL STIPULATION

I. Plaintiff seeks the following forms of relief in this action:

Money damages.

II. This Court has jurisdiction based upon the following facts:

Federal question.

III. The parties stipulate that the following facts will require no proof at trial:

Plaintiff, Sandra Pallatto, was employed as a caseworker at the Westmoreland County Children's Bureau. Plaintiff left her employment in May 2010.

IV. The following issues of fact remain in dispute:

All facts on the issues of liability and damages remain in dispute.

V. The following issues of law remain in dispute:

All the legal application of all Counts of Plaintiff's Complaint are in dispute.

VI. The following deposition testimony will be offered at trial:

It is not anticipated that deposition testimony will be offered at trial in lieu of the appearances of witnesses.

VII. The following individuals will be offered as experts at trial based upon the accompanying statement of qualifications for each individual:

The Plaintiff and the Westmoreland County Children's Bureau have not identified any experts for trial.

VIII. The parties estimate they will need the following number of six (6) hour days to try this action:

Plaintiff's case-in-chief:	2.5 days
Defendant's case-in-chief:	2,5 days
Third-Party Defendant's case-in-chief:	N/A
TOTAL TIME NEEDED:	5 days

Respectfully submitted,

By: /s/ Susan N. Williams Esquire
Susan N. Williams, Esquire
Pa. I.D. #40077

By: /s/ Adam R. Gorzelsky, Esquire
Pa. I.D. 309094
Counsel for Plaintiff

Respectfully submitted,

By: /s/ Thomas P. Pellis, Esquire
Thomas P. Pellis, Esquire
Pa. I.D. 52713
Counsel for Defendant

Dated this 11th day of February, 2013.